

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division

CLERK'S OFFICE U.S. DIST. COURT  
AT ROANOKE, VA  
FILED

AUG 11 2017

JULIA G. BURLEY, CLERK  
BY:   
DEPUTY CLERK

JASON KESSLER,  
Plaintiff,

v.

CITY OF CHARLOTTESVILLE

and

MAURICE JONES,  
Charlottesville City Manager  
In his official and individual capacities,

Defendants.

Case No. 3:17cv 56

**DECLARATION OF RICHARD SINCERE**

I, Richard Sincere, declare under penalty of perjury that the following is true and based on my personal knowledge:

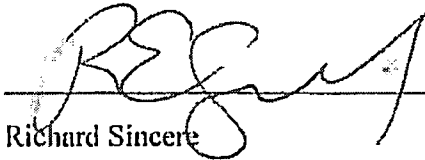
1. I was a resident of the City of Charlottesville from October 1999 until March 2016. Since March 2016, I have been a resident of Albemarle County.
2. As set forth in Paragraph 44 of the Complaint, I have personal knowledge that at least two thousand (2,000) were accommodated in what is now Emancipation Park during Charlottesville Pride Festivals held in 2013, 2014, and 2015.
3. On September 14, 2013, I attended the Charlottesville Pride Festival in Lee Park, where I observed a large crowd of individuals spread throughout the grounds of the park. Based on my recollection of that day, I estimated attendance at more than two thousand (2,000).
4. On September 13, 2014, I attended the Charlottesville Pride Festival in Lee Park, where I again observed more than two thousand (2,000) individuals spread throughout the grounds of the park.

5. On September 19, 2015, I attended the Charlottesville Pride Festival in Lee Park, where I once more observed more than two thousand (2,000) individuals spread throughout the grounds of the park.

6. On each of these three days, Lee Park was also crowded with tables, tents, and a performance stage that reduced the area in which people could sit or stand but the numbers of individuals, as I observed and as were reported by the news media, fit comfortably into the remaining space available to them.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and ability.

Date: Aug 10, 2017

  
Richard Sincere